

NATHAN R. REINMILLER, ESQ.  
Nevada Bar No. 6793  
ALVERSON, TAYLOR,  
MORTENSEN & SANDERS  
7401 W. Charleston Boulevard  
Las Vegas, NV 89117  
Tel: (702) 384-7000  
Fax: (702) 385-7000  
Attorney for Defendants

## UNITED STATES DISTRICT COURT

## DISTRICT OF NEVADA

ST. MATTHEW'S UNIVERSITY )  
(CAYMAN) LTD., a Cayman Islands )  
company, )

Plaintiff, )

v. )

SABA UNIVERSITY SCHOOL OF )  
MEDICINE FOUNDATION, a Netherland- )  
Antilles company; MEDICAL )  
UNIVERSITY OF THE AMERICAS, a St. )  
Kitts & Nevis company; EDUCATION )  
INFORMATION CONSULTANTS, INC., a )  
Massachusetts corporation; EDUCATIONAL )  
INTERNATIONAL CONSULTANTS, LLC, )  
a Massachusetts limited liability company; )  
PATRICIA L. HOUGH, M.D., an individual, )  
and d.b.a. "Saba University School of )  
Medicine"; DAVID L. FREDRICK, an )  
individual; PANKAJ DESAI, M.D., an )  
individual; ASSOCIATION OF AMERICAN )  
INTERNATIONAL MEDICAL )  
GRAUDATES, INC., a Nevada corporation, )  
a.k.a. "[aaimg@yahoo.com](mailto:aaimg@yahoo.com)"; THOMAS )  
MOORE, M.D. a.k.a. )  
"[presaaimg@hotmail.com](mailto:presaaimg@hotmail.com)" and )  
"[crocdoc2004@netzero.net](mailto:crocdoc2004@netzero.net)," an individual; )  
SARAH B. WEINSTEIN a.k.a. )  
"[execsecaaimg@hotmail.com](mailto:execsecaaimg@hotmail.com)," an individual; )  
RACHAEL E. SILVER, an individual; and )  
DIEDRE MOORE, an individual, )

Defendants. )

Case No.: CV-S-05-0848-RCJ (LRL)

**DEFENDANTS' PROPOSED  
DISCOVERY PLAN AND SCHEDULING  
ORDER SUBMITTED IN COMPLIANCE  
WITH L.R. 26-1(e)**

ALVERSON, TAYLOR, MORTENSEN & SANDERS  
LAWYERS  
7401 WEST CHARLESTON BOULEVARD  
LAS VEGAS, NEVADA 89117  
(702) 384-7000

**DEFENDANTS' PROPOSED DISCOVERY PLAN AND  
SCHEDULING ORDER SUBMITTED IN COMPLIANCE WITH L.R. 26-1(e)**

Defendants Patricia Hough and Association of American International Medical Graduates (AAIMG) file this Discovery Plan and Scheduling Order. SABA University School of Medicine Foundation, David L. Fredrick, Pankaj Desai, M.D. and Education Information Consultants, Inc. and Education International Consultants, LLC do not join in this submission in light of their pending motions to dismiss on the ground of lack of personal jurisdiction and other grounds.

**PROCEEDINGS PRIOR TO CASE CONFERENCE**

- Date of filing of Plaintiff ST. MATTHEW'S UNIVERSITY (CAYMAN), LTD.'s ("SMU") Complaint: July 12, 2005
- Date of filing of First Amended Complaint ("FAC"): October 28, 2005
- Date of filing of Defendant PATRICIA L. HOUGH, M.D.'s ("HOUGH") Answer to FAC: February 15, 2006
- Date of filing of Defendant ASSOCIATION OF AMERICAN INTERNATIONAL MEDICAL GRADUATES, INC.'s ("AAIMG") Answer to FAC: February 15, 2006
- Date of filing of Defendants HOUGH and AAIMG's Motion to Dismiss Claims 2, 3, 5, 6 of FAC: February 15, 2006
- Date of filing of Defendant DAVID L. FREDRICK's ("FREDRICK") Motion to Dismiss FAC: February 15, 2006.
- Date of filing of Stipulation Between Parties Extending Time to Schedule Rule 26(f) Conference: March 23, 2006
- Date of entry of Order Granting Stipulation Between Parties Extending Time to Schedule Rule 26(f) Conference: March 24, 2006
- Date of filing of Defendant HOUGH's Answer and Joinder to Motion to Dismiss FAC against Defendants THOMAS MOORE, M.D., SARAH B. WEINSTEIN, RACHAEL E. SILVER, and DIEDRE MOORE : April 4, 2006
- Date of filing of Defendant PANKAJ DESAI's ("DESAI") Motion to Dismiss

FAC: April 4, 2006

- Date of filing of Defendant SABA UNIVERSITY SCHOOL OF MEDICINE FOUNDATION's ("SABA") Motion to Dismiss FAC: April 7, 2006
- Date of filing of Defendants EDUCATION INFORMATION CONSULTANTS, INC. and EDUCATION INTERNATIONAL CONSULTANTS, LLC. (collectively "EICs") Motion to Dismiss FAC: April 7, 2006
- Date of filing of Defendants' Request for Oral Argument on Motions to Dismiss: May 4, 2006
- Date of L.R. 26-1(d) Conference: Counsel conferred on May 11, 2006 via telephone to discuss initial discovery disclosures and develop the following discovery plan.

## II. DISCOVERY ANTICIPATED

Defendants HOUGH and AAIMG ( all hereinafter "the Parties") anticipate the need to serve interrogatories, requests for production of documents and requests for admission.

Defendants Hough and AAIMG believe that the number of depositions needed by the parties will not exceed a total of ten for Plaintiffs and a total of ten for all Defendants.

## III. DISCOVERY PLAN

Discovery Commencement Date: Defendants Hough and AAIMG propose that discovery should not commence until after the date of the Court's ruling on the last appearing Defendant's motion to dismiss and that depositions shall not commence until 90 days after the commencement of discovery.

Discovery Cut-Off Date: Defendants Hough and AAIMG propose that the discovery cut-off date ("Discovery Cut-Off Date") shall be 270 days after the date of the Discovery Commencement Date.

Amending Pleadings and Adding Parties: The deadline for amending the pleadings and adding parties shall be 90 days prior to the Discovery Cut-Off Date.

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